

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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SIGALIT YEHUDA, :  
Plaintiff, : 21-cv-08921 (AT)  
v. :  
: DECLARATION OF  
JOSSEF KAHLON : STEVEN R. HAFFNER  
Defendant/Counterclaim Plaintiff, :  
v. :  
AVRAHAM YEHUDA, :  
Counterclaim Defendant. :  
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STEVEN R. HAFFNER, a member of the Bar of this Court, declares as follows:

1. I am a member of Gordon & Haffner, LLP, attorneys for the Plaintiff and Counterclaim Defendant herein and submit this declaration in opposition to Defendant's motion for summary judgment dismissing the Complaint and for summary judgment on his "First" and "Fifth" Counterclaims and in support of Plaintiff's cross motion for summary judgment seeking an interlocutory judgment of accounting.
2. A true and correct copy of the Answer and Counterclaims of Project Verte Inc. ("PVI") filed in the case: *Zuchaer & Zuchaer Consulting LLC v. Project Verte Inc.*, ("Related SDNY Case") is attached as **Exhibit A**.
3. A true and correct copy of the Third Party Amended Answer of Jossef Kahlon and TNJ Holdings, Inc. with Counterclaim filed in the Related SDNY Case is attached as **Exhibit B**.
4. A true and correct copy of the letter by Dan Abrams, Esq. to Judge Victor Marrero (the judge presiding over the Related SDNY Case), is attached as **Exhibit C**.

5. A true and correct copy of Judge Marrero's Decision and Order in the Related SDNY Case, dated July 8, 2021, dismissing PVI's "First" and "Second" Counterclaims sounding in fraud, is attached as **Exhibit D.**

6. A true and correct copy of the letter by Steven R. Haffner, Esq. to Jossef Kahlon, dated April 21, 2021, demanding on Sigalit Yehuda's behalf that Kahlon provide a verified statement of account of all of his dealings with TJ Management Group, LLC ("TJM"), and its property and earnings, during the period November 15, 2004 to the present, is attached as **Exhibit E.**

7. A true and correct copy of the corrected letter to PVI's counsel Jordan Weiss is attached as **Exhibit F.**

8. A true and correct copy of the AAA Arbitration Award is attached as **Exhibit G.**

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15<sup>th</sup> day of March 2022.

/s/ Steven R. Haffner  
Steven R. Haffner